

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**Filed Under Seal**

|                          |   |   |
|--------------------------|---|---|
| UNITED STATES OF AMERICA | : | CRIMINAL NO: <u>18-315</u>              |
| v.                       | : | DATE FILED: _____                       |
| MICHAEL HARRIS (1)       | : | VIOLATIONS:                             |
| a/k/a "Chico,"           | : | 21 U.S.C. § 846 (conspiracy to          |
| a/k/a "Mikey,"           | : | distribute controlled substances – 1    |
| ALEXANDER BURNETT (2)    | : | count)                                  |
| a/k/a "Pop,"             | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| a/k/a "Poppy,"           | : | heroin – 93 counts)                     |
| a/k/a "Ace,"             | : | 21 U.S.C. § 841(a)(1) (possession with  |
| a/k/a "Tony,"            | : | intent to distribute heroin – 3 counts) |
| HYNEEF HARVEY (3)        | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| a/k/a "Neef,"            | : | alprazolam and heroin – 3 counts)       |
| DANA STEWART (4)         | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| a/k/a "Bedrock,"         | : | fentanyl – 1 count)                     |
| a/k/a "B.R.,"            | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| PAUL ROBINSON (5)        | : | cocaine base ("crack") – 1 count)       |
| ANTHONY QUAIL (6)        | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| a/k/a "Taz,"             | : | cocaine base ("crack") and fentanyl –   |
| MAKAL HARRIS (7)         | : | 1 count)                                |
| a/k/a "Stu,"             | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| BASIL JOHNSON (8)        | : | cocaine base ("crack") and heroin – 1   |
| a/k/a "Mac,"             | : | count)                                  |
| a/k/a "Cali,"            | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| GLEN LONG (9)            | : | heroin and oxycodone – 1 count)         |
| a/k/a Big Dog,"          | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| ANTOINE ADAMS (10)       | : | 3 - methylfentanyl – 2 counts)          |
| a/k/a "Twin,"            | : | 21 U.S.C. § 841(a)(1) (distribution of  |
| BYSIL DOE (11)           | : | oxycodone – 1 count)                    |
| a/k/a "Baz,"             | : | 21 U.S.C. § 841(a)(1) (possession with  |
| SHYHEIM LINDER (12)      | : | intent to distribute alprazolam – 1     |
| a/k/a "Shy,"             | : | count)                                  |
| CIEAR HAYES (13)         | : | 21 U.S.C. § 841(a)(1) (possession with  |
| a/k/a "Gutter,"          | : | intent to distribute alprazolam and     |
| JAMES MASON (14)         | : | heroin – 1 count)                       |
| a/k/a "Hov,"             | : | 21 U.S.C. § 860 (distribution of        |
| BARRY THORNTON (15)      | : | controlled substances within 1,000      |
| KEVIN FISHER (16)        | : | feet of a school – 49 counts)           |
| SHELIA YOUNG (17)        | : | 21 U.S.C. § 856 (maintaining a drug     |
| a/k/a "Snoop,"           | : | house – 2 counts)                       |
| DAKAR RILEY (18)         | : | 18 U.S.C. § 924(c) possession of a      |
| TYREEK BAILEY (19)       | : | firearm in furtherance of a drug        |
| a/k/a "Reek,"            | : | trafficking – 1 count)                  |
| JUSTIN PAYNE (20)        | : | 18 U.S.C. § 922(g) (felon in possession |

a/k/a “Ski,”  
a/k/a “Little Ski”

of a firearm – 1 count)  
18 U.S.C. § 2 (aiding and abetting)  
Notices of Forfeiture

**FIRST SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or around 2013 to in or around July, 2018, in Philadelphia and Upper Darby, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MICHAEL HARRIS,**  
a/k/a “Chico,”  
a/k/a “Mikey,”  
**ALEXANDER BURNETT,**  
a/k/a “Poppy,”  
a/k/a “Pop,”  
a/k/a “Ace,”  
a/k/a “Tony,”  
**HYNEEF HARVEY,**  
a/k/a “Neef,”  
**DANA STEWART,**  
a/k/a “Bedrock,”  
a/k/a “B.R.,”  
**PAUL ROBINSON,**  
**MAKAL HARRIS,**  
a/k/a “Stu,”  
**BASIL JOHNSON,**  
a/k/a “Mac,”  
**ANTHONY QUAIL,**  
a/k/a “Taz,”  
**GLEN LONG,**  
a/k/a “Big Dog”  
**ANTOINE ADAMS,**  
a/k/a “Twin,”  
**BYSIL DOE,**  
a/k/a “Baz,”  
**SHYHEIM LINDER,**  
a/k/a “Shy,”  
**CIEAR HAYES,**  
a/k/a “Gutter,”  
**JAMES MASON,**  
a/k/a “Hov”

**BARRY THORNTON,  
KEVIN FISHER,  
SHELIA YOUNG,  
DAKAR RILEY,  
TYREEK BAILEY,  
a/k/a “Reek,”  
JUSTIN PAYNE,  
a/k/a “Ski,”  
a/k/a “Lil Ski,”**

conspired and agreed, together and with Person #1 and others known and unknown to the grand jury, to knowingly and intentionally distribute controlled substances, that is, a mixture and substance containing a detectable amount of heroin, and a mixture and substance containing a detectable amount of cocaine base (“crack”), both Schedule I controlled substances; a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance; and a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It is further alleged that, with respect to the conspiracy charged in this Count, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 28 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendants MICHAEL HARRIS, ALEXANDER BURNETT, HYNEEF HARVEY, DANA STEWART, PAUL ROBINSON, ANTHONY QUAIL, MAKAL HARRIS, BASIL JOHNSON, GLEN LONG, ANTOINE ADAMS, BYSIL DOE, SHYHEIM LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, SHELIA YOUNG, DAKAR RILEY, and TYREEK BAILEY, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(B).

3. It is further alleged that, with respect to the conspiracy charged in this Count, 100 grams or more of a mixture and substance containing a detectable amount of heroin,

a Schedule I controlled substance, is attributable to and was reasonably foreseeable to defendant JUSTIN PAYNE, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

**MANNER AND MEANS**

It was part of the conspiracy that:

4. Defendants MICHAEL HARRIS and ALEXANDER BURNETT were the leaders and organizers of a heroin distribution group that operated primarily in the “Overbrook” section of the city of Philadelphia, Pennsylvania (referred to by various names, including “Monte Vista Boys” and “Hilltop;” hereinafter referred to as the “Hilltop Drug Trafficking Group” (DTG)). From in or around 2013 to in or around July, 2018, the “DTG” distributed in excess of a kilogram of heroin and 28 grams of cocaine base (“crack”).

5. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL, and others known and unknown to the grand jury, obtained multi-gram quantities of loose heroin and hundreds of bundles of packaged heroin from suppliers in the Eastern District of Pennsylvania and elsewhere, including Person #1, charged elsewhere and others, known and unknown to the grand jury.

6. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS and others known and unknown to the grand jury, shared heroin suppliers and supplied “runners” with packets of heroin, stamped identically, to re-distribute.

7. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, DANA STEWART, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL sold heroin supplied by Person #1, charged elsewhere, and others, and also supplied the heroin to other members of the DTG, including: M.R., charged elsewhere and defendants DANA STEWART, GLEN LONG, ANTOINE ADAMS, BYSIL DOE, SHYHEIM

LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, JACKSON, SHELIA YOUNG, DAKAR RILEY, TYREEK BAILEY and JUSTIN PAYNE, as well as male juveniles known to the grand jury, and others known and unknown to the grand jury, to sell.

8. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, DANA STEWART, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL, and others known and unknown to the grand jury, packaged the heroin for re-sale and had others do so for them, and then sold the heroin themselves, and supplied the heroin to other members of the DTG, including: M.R., charged elsewhere and defendants DANA STEWART, GLEN LONG, ANTOINE ADAMS, BYSIL DOE, SHYHEIM LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, SHELIA YOUNG, DAKAR RILEY, TYREEK BAILEY and JUSTIN PAYNE as well as male juveniles known to the grand jury, and others known and unknown to the grand jury, to redistribute.

9. Person #1, charged elsewhere, supplied defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL with heroin to repackage into smaller quantities to sell.

10. The DTG stored heroin inside residences located at 5412 Trinity Street, 5816 Washington Avenue in Philadelphia and Park Lane East Apartments, located at 250 Beverly Road in Upper Darby, known to the DTG and its customers respectively as “The Spot,” “The Chill Crib,” and the “Apartments,” which served as “stash” houses for the DTG.

11. The DTG purchased and supplied pre-paid cellphones for its members who acted as “runners” delivering heroin to customers who had placed orders on cellphones controlled by defendants MICHAEL HARRIS, ALEXANDER BURNETT, DANA STEWART, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and

ANTHONY QUAIL.

12. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, HYNEEF HARVEY, DANA STEWART, PAUL ROBINSON, GLEN LONG, MAKAL HARRIS, BASIL JOHNSON, ANTOINE ADAMS, BYSIL DOE, SHYHEIM LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, SHELIA YOUNG, DAKAR RILEY, TYREEK BAILEY and JUSTIN PAYNE and others known and unknown to the grand jury, distributed heroin, crack cocaine, oxycodone, fentanyl and alprazolam to customers both inside and outside the DTG's geographic territory, which was primarily located in and around West Philadelphia (Overbook, Southwest Philadelphia) and Upper Darby.

13. Defendants MICHAEL HARRIS, ALEXANDER BURNETT and HANEEF HARVEY sent out blast text messages to hundreds of customers advertising new stamps, products and or prices including sales and discounts for referring new customers.

14. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL, and others known and unknown to the grand jury, shared cellular telephones that customers contacted to place drug orders. These phones were known as "Ace's phone" and "Chico's phone" to the DTG's customers because "Ace" and "Chico" are the aliases that defendants MICHAEL HARRIS and ALEXANDER BURNETT, the DTG's leaders, used to sell narcotics. DTG members used these as well as other telephones (hereafter, "the DTG phones") to arrange drug deals with customers and coordinate drug trafficking activities amongst themselves.

15. Defendants DANA STEWART, GLEN LONG, ANTOINE ADAMS, BYSIL DOE, SHYHEIM LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, SHELIA YOUNG, DAKAR RILEY, TYREEK BAILEY and JUSTIN

PAYNE worked as runners generally between the hours of 9:00 a.m. and midnight, seven days a week, fulfilling drug orders received over the DTG phones. In most instances, defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL arranged the drug deals using DTG phones and directed the customer to the locations where the customer met the runner and quickly conducted a “hand to hand” exchange of money for drugs. Defendant MICHAEL HARRIS personally supplied many of the customers ordering off of the DTG’s “Chico” telephone after midnight.

16. DTG members often hid the drugs that they were selling in various “stash” locations including houses and hidden compartments in vehicles, near where they were selling, in order to avoid having large quantities of drugs on their person in the event police were in the area or police stopped them.

17. DTG members used drug addicts from the area, including but not limited to, C.D., E.C., and C.T., known to the grand jury, and others known and unknown to the grand jury, to assist in testing heroin for the level of potency (“quality”).

18. DTG members routinely warned each other and their customers of the presence of law enforcement in the area and used counter-surveillance tactics to prevent detection by law enforcement.

19. Defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL supplied runners with drugs to meet customers. After completing the sales, runners received a previously agreed portion of the profits. Once the supply ran out, DTG leadership re-supplied the runners.

20. After replenishing their drug supply, defendants MICHAEL HARRIS, ALEXANDER BURNETT, MAKAL HARRIS, BASIL JOHNSON, HYNEEF HARVEY, PAUL ROBINSON and ANTHONY QUAIL contacted drug customers via the DTG phones, both via text message and phone calls, to notify the customers that the DTG had narcotics for sale. DTG also members contacted customers from whom they had not received an order in an unusually long period of time, in an effort to make additional drug sales.

21. When discussing and arranging drug deals over DTG phones, defendants MICHAEL HARRIS, ALEXANDER BURNETT, HYNEEF HARVEY, DANA STEWART, PAUL ROBINSON, ANTHONY QUAIL, MAKAL HARRIS, BASIL JOHNSON, GLEN LONG, ANTOINE ADAMS, BYSIL DOE, SHYHEIM LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, SHELIA YOUNG, DAKAR RILEY, TYREEK BAILEY and JUSTIN PAYNE as well as DTG customers, used coded language to refer to drugs, drug amounts, and drug packaging. For example, these defendants and their customers referred to crack cocaine by several different names including “hard;” referred to heroin by several different names including “D,” “dope,” “B,” “full one,” “half,” “whole one,” “twist,” “rack,” “sleeve,” “slow,” “slices,” “diesel,” and “bundle;” referred to alprazolam as “xanies,” and “bars;” and percocets as “percs,” “erks,” “ercs,” “erc-daddy,” “teenagers,” and “footballs.”

22. Customers routinely requested heroin with particular stamps such as “Sponge Bob,” “Platinum Label,” “Plain Blue Ones,” “Red Rum,” “Big Rings,” “Diesel,” “Selfies,” “Rock Star,” “Good 4 You,” “Hands Up,” “Huskee,” “Emoji Hands,” and “X-Box.”

23. To protect their drug trafficking activities, members of the Hilltop DTG routinely carried, and sometimes used, loaded firearms or had firearms available in hidden locations.



24. DTG members took over the phones of incarcerated DTG members and then split the profits from drug sales conducted on these telephones.

25. DTG members used prison telephones to communicate with each other, direct runners, and coordinate the business of the DTG.

26. Defendants HYNEEF HARVEY and PAUL ROBINSON took over the DTG's "Chico" telephone while defendant MICHAEL HARRIS was in custody and then supplied heroin to other members of the DTG for re-distribution including S.J. and defendants DAKAR RILEY and BYSIL DOE.

27. DTG members often referred to drug customers as "Weenies," "Players," and "Dots."

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its object, the defendants MICHAEL HARRIS, ALEXANDER BURNETT, HYNEEF HARVEY, DANA STEWART, PAUL ROBINSON, ANTHONY QUAIL, MAKAL HARRIS, BASIL JOHNSON, GLEN LONG, ANTOINE ADAMS, BYSIL DOE, SHYHEIM LINDER, CIEAR HAYES, JAMES MASON, BARRY THORNTON, KEVIN FISHER, SHELIA YOUNG, DAKAR RILEY, TYREEK BAILEY, and JUSTIN PAYNE, and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about August 7, 2014, defendant ALEXANDER BURNETT, M.R., and D.Q., both charged elsewhere, distributed heroin and fentanyl to C.F. and C.F.'s death resulted from the use of the heroin and fentanyl.

2. On or about October 23, 2014, defendant MICHAEL HARRIS directed a runner to distribute 2 bundles (approximately 0.60 grams) of heroin stamped “Platinum Label” to a law enforcement officer acting in an undercover capacity (UC), in the unit block of 53<sup>rd</sup> Street.

3. On or about December 4, 2014, defendant MICHAEL HARRIS directed a runner to distribute 2 bundles (approximately 0.63 grams) of heroin stamped “Johnny Walker” to a law enforcement officer acting in an undercover capacity (UC) after they directed him to the 5700 block of Webster Street.

4. On or about February 3, 2015, defendants MICHAEL HARRIS and SHELIA YOUNG distributed 27 packets (approximately 0.82 grams) of heroin stamped “MORE” to a law enforcement officer acting in an undercover capacity (UC) after they directed the UC to the 5800 block of Elmwood Avenue.

5. On or about February 26, 2015, defendant ALEXANDER BURNETT sent a blast text message to the DTG’s customers whose numbers were in his telephone advertising the drugs he had to sell.

6. On or about May 11, 2015, defendant MICHAEL HARRIS directed a runner to distribute 2 bundles (approximately 0.87 grams) of heroin stamped “MORE” to a law enforcement officer acting in an undercover capacity (UC) after they directed the UC to the 5200 block of Chancellor Street.

7. On or about June 6–7, 2015, defendant ALEXANDER BURNETT sent a blast text message to the DTG’s customers whose numbers were in his telephone advertising the drugs he had to sell and his hours of operation.

8. On or about August 18, 2015, defendants MICHAEL HARRIS and BARRY

THORNTON distributed 2 bundles (approximately 0.71 grams) of heroin stamped “EMOJI HANDS” to a law enforcement officer acting in an undercover capacity (UC) after they directed the UC to the 5100 block of Arch Street.

9. On or about August 26, 2015, defendant MICHAEL HARRIS directed a runner to distribute 2 bundles (approximately 0.82 grams) of heroin stamped “EMOJI HANDS” AND “GOOD 4 YOU” to a law enforcement officer acting in an undercover capacity (UC) after they directed the UC to the 5400 block of Osage Avenue.

10. On or about October 19, 2015, in the area of 502 Vodges Street, defendant KEVIN FISHER possessed 12 vials of cocaine base (“crack”) and 70 packets of heroin, with the intent to distribute it.

11. On or about October 31, 2015, defendants ALEXANDER BURNETT and MAKAL HARRIS discussed the fact that defendants BASIL JOHNSON, ANTHONY QUAIL and MICHAEL HARRIS would run the DTG’s business while defendant BURNETT was in prison.

On or about November 2, 2015:

12. Defendants ALEXANDER BURNETT and MICHAEL HARRIS discussed the need for defendant HARRIS to move his and defendant BURNETT’s drugs out of their hiding places before the police discovered them.

13. Defendants ALEXANDER BURNETT and MICHAEL HARRIS discussed defendant HARRIS completing a drug deal with one of their suppliers.

14. Defendant MAKAL HARRIS informed defendant ALEXANDER BURNETT that their drug trafficking business was still operating successfully.

15. Defendant BYSIL DOE informed defendant ALEXANDER BURNETT that a individual had drug proceeds for defendant BURNETT.

16. Defendant ALEXANDER BURNETT informed a DTG member that defendant MAKAL HARRIS' source of supply only wanted to deal with defendant HARRIS and that could pose a problem for defendant BURNETT.

17. Defendant MICHAEL HARRIS informed defendant ALEXANDER BURNETT that he had almost caught up with a rival but the individual had left the area by the time defendant HARRIS had returned with his gun.

18. Defendants ALEXANDER BURNETT and MICHAEL HARRIS discussed the fact that defendant BURNETT's source of supply would only deal with defendant MAKAL HARRIS while defendant BURNETT was in custody and that the source refused to deal with defendant BASIL JOHNSON even though the source knew defendant JOHNSON.

19. Defendant ANTHONY QUAIL paid the bills on three telephones for defendant ALEXANDER BURNETT.

20. On or about November 3, 2015, defendants ALEXANDER BURNETT and MAKAL HARRIS discussed the fact that defendant DANA STEWART met with the supplier but did not finalize the deal.

On or about November 5, 2015:

21. Defendant ALEXANDER BURNETT informed defendant BASIL JOHNSON that a DTG member was going to call defendant JOHNSON and defendant BYSIL DOE to facilitate a drug deal.

22. Defendant ALEXANDER BURNETT informed defendant MICHAEL HARRIS that defendant BURNETT contributed \$600.00 towards purchasing drugs with two other individuals.

23. Defendant ALEXANDER BURNETT informed defendant MICHAEL HARRIS

that defendant BURNETT left some drugs for defendant HARRIS in a stash location in defendant BURNETT's minivan.

24. Defendant ALEXANDER BURNETT directed defendant ANTHONY QUAIL to tell a supplier that defendant QUAIL would be meeting with the supplier from now on and that the business was still running. Defendant BURNETT also directed defendant QUAIL to give the supplier defendant BYSIL DOE's telephone number.

25. Defendant ANTHONY QUAIL informed defendant ALEXANDER BURNETT that he did not buy all of the drugs he wanted to get because he did not have enough money.

26. On or about November 7, 2015, defendant BASIL JOHNSON informed defendant ALEXANDER BURNETT that he gave 6 bundles of heroin to sell to a DTG member and he had the money from all of the other bundles he sold.

On or about November 8, 2015:

27. Defendant ALEXANDER BURNETT directed defendant MAKAL HARRIS to collect defendant BURNETT's drug proceeds from a DTG member.

28. Defendant ALEXANDER BURNETT instructed defendant BYSIL DOE to alternate days distributing drugs for the DTG with defendant ANTOINE ADAMS.

29. On or about November 17, 2015, defendants MICHAEL HARRIS and KEVIN FISHER distributed 31 packets (approximately 1.004 grams) of heroin stamped "SUPPORT" to a law enforcement officer acting in an undercover capacity (UC) after they directed him to the unit block of S. 63<sup>rd</sup> Street.

30. On or about December 11, 2015, defendant MAKAL HARRIS possessed with intent to distribute 10 bundles (approximately 5.669 grams) of heroin stamped "Sponge Bob."

On or about December 16, 2015:

31. Defendants MICHAEL HARRIS and BYSIL DOE distributed 2 bundles (approximately 0.83 grams) of heroin stamped “Sponge Bob” to a law enforcement officer acting in an undercover capacity (UC) after they directed him to the 6200 block of Pine Street.

32. Defendants MICHAEL HARRIS and BYSIL DOE distributed ½ bundle (approximately 0.33 grams) of heroin and approximately 0.16 grams of cocaine base “crack” to M.D. after they directed him to the 5900 block of Spruce Street.

On or about January 10, 2016:

33. Defendant ANTOINE ADAMS possessed 148 packets of heroin in the 5400 block of Osage Avenue with the intent to distribute it.

34. On or about January 26, 2016, defendants MICHAEL HARRIS and KEVIN FISHER distributed 2 bundles (approximately 0.73 grams) of heroin stamped “Sponge Bob” to a law enforcement officer acting in an undercover capacity (UC) after they directed him to the 4800 block of Westminster Avenue.

On or about March 15, 2016:

35. Defendant MICHAEL HARRIS directed a runner to distribute 6 packets of heroin to a customer they had directed to the 5400 block of Trinity Street.

36. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$70 worth of heroin to a customer they had directed to the 5400 block of Trinity Street.

37. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 13 bags of heroin to two customers they had directed to the 5400 block of Trinity Street.

38. Defendant ANTOINE ADAMS telephoned defendant MICHAEL HARRIS and told him that he was out of heroin to sell.

On or about March 16, 2016:

39. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a bundle of heroin to a customer they had directed to the 5400 block of Trinity Street.

40. Defendant MICHAEL HARRIS instructed defendant SHYHEIM LINDER that he was not to provide a customer with heroin on credit.

41. Defendants MICHAEL HARRIS and SHYHEIM LINDER used the telephone to discuss the fact that defendant HARRIS was out of heroin and was trying to reach Person #1 to be re-supplied.

42. Defendant MICHAEL HARRIS used the telephone to attempt to get another source of supply for narcotics.

43. Defendants MICHAEL HARRIS and SHYHEIM LINDER discussed a potential altercation with a rival drug group, and defendant HARRIS offered to get a gun and come to defendant DOE's aid.

44. Defendant SHYHEIM LINDER informed defendant MICHAEL HARRIS that an individual from a rival drug gang had been riding around Southwest Philadelphia looking for defendant HARRIS and if this individual found defendant HARRIS he was going to shoot defendant HARRIS. Defendant DOE told defendant HARRIS that an associate of theirs spoke to the other individual and the situation was defused.

45. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a 1.5 bundles of heroin stamped "Sponge Bob" to a customer they had directed to the 5400 block of Trinity Street.

46. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a ½ a bundle of heroin to a customer they had directed to the 5400 block of Trinity Street.

47. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 6 packets of heroin to a customer they had directed to the 5400 block of Trinity Street.

On or about March 17, 2016:

48. Defendant MICHAEL HARRIS called defendant ANTOINE ADAMS and relayed a warning that a woman had called the police on one of their customers because defendant ADAMS had the customer waiting too long to purchase heroin.

49. Defendants MICHAEL HARRIS and ANTOINE ADAMS used the telephone to discuss the price of some guns defendant HARRIS had an opportunity to buy for approximately \$1200. Defendant ADAMS offered defendant HARRIS \$500 towards the purchase of the guns and discussed the fact that defendant HARRIS was out of heroin and was trying to reach Person #1 to be re-supplied.

50. Defendants MICHAEL HARRIS and ANTOINE ADAMS used the telephone to discuss how many bundles of heroin the DTG had left to sell. Defendant HARRIS had given defendant ADAMS a “sleeve” (10 bundles). Defendant ADAMS had 2 bundles left and had also sold the packets with no stamp on them to customers, without complaint.

51. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a bundle of heroin to a customer they directed to the 5400 block of Trinity. Defendant HARRIS called the customer after the sale to inquire as to the quality of the heroin he had just sold him.

52. Defendant MICHAEL HARRIS agreed to purchase Xanax from a supplier for re-distribution.

53. Defendant MICHAEL HARRIS engaged in a text exchange with C.D. about the quality of the heroin he had just sold him and others. Defendant HARRIS wanted to make sure that the customers “didn’t say anything bad about it...”

54. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 12 packets of heroin to a customer they directed to the 5400 block of Trinity.



55. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a bundle of heroin stamped “Sponge Bob” to a customer for \$90.00 after they directed to the 5400 block of Trinity Street.

56. Defendants MICHAEL HARRIS and SHYLEIM LINDER discussed defendant LINDER using DTG profits to pay defendant LINDER’s telephone bill.

57. Defendant SHYHEIM LINDER called defendant MICHAEL HARRIS to inform him that he never retrieved the drugs from the stash car. Defendant HARRIS directed defendant BYSIL DOE to come to his home and pick up the drugs for re-distribution.

On or about March 18, 2016:

58. Defendant MICHAEL HARRIS and Person #4, known to the grand jury, discussed purchasing 90 Xanax pills for \$2.00 per pill.

59. Defendant MICHAEL HARRIS directed a runner to distribute heroin to C.D. after they directed him to the Apartments.

60. Defendant MICHAEL HARRIS directed a runner to distribute approximately 7 bundles of heroin stamped “Sponge Bob” to Person #5, charged elsewhere.

61. Defendants MICHAEL HARRIS and ANTOINE ADAMS directed a runner to distribute ½ bundle of heroin to a customer they directed to the 5400 block of Trinity Street.

62. Defendant MICHAEL HARRIS directed a runner to distribute 3 Percocet pills to a customer they directed to 58<sup>th</sup> & Baltimore Avenue.

On or about March 19, 2016:

63. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed approximately 7 packets of heroin to a customer they directed to the 5400 block of Trinity Street.

64. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a bundle of heroin to a customer they directed to the 5400 block of Trinity Street.

65. Defendant MICHAEL HARRIS used the telephone to discuss purchasing heroin from one of his suppliers, Person #1.

66. On or about March 20, 2016, defendant MICHAEL HARRIS directed a runner to distribute approximately 7 bundles of heroin stamped “Sponge Bob” to Person #5, charged elsewhere.

On or about March 22, 2016:

67. Defendant MICHAEL HARRIS directed a runner to distribute 10 bundles of heroin to one customer and 7 bundles of heroin to a second customer in the same car.

68. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to discuss law enforcement presence in the parking lot of the Apartments.

69. Defendant MICHAEL HARRIS directed a runner to distribute approximately 1 ½ bundles of heroin stamped “Selfie,” to C.D. whom they directed to the 5000 block of Walton Street.

70. Defendant MICHAEL HARRIS used the telephone to discuss traveling to Atlanta, Georgia to purchase cocaine and exotic marijuana.

71. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 4 Xanax pills and fronted a packet of heroin to a customer they directed to the 5800 block of Washington Avenue.

72. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 12 packets of heroin to a customer they directed to 59<sup>th</sup> & Washington.

73. On or about March 23, 2016, defendant MICHAEL HARRIS directed a runner to distribute 12 packets of heroin to a customer they directed to the 6200 block of Ludlow Street.

On or about March 24, 2016:

74. Defendants MICHAEL HARRIS and SHELIA YOUNG discussed the status of

the DTG's drug business.

75. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 4 packets of heroin to T.H. after they directed him to the 5400 block of Trinity Street.

76. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to make sure all of the DTG's runners' telephones were working.

77. Defendant MICHAEL HARRIS directed a runner to distribute ½ bundle of heroin and 3 Xanax pills to C.T. after they directed him to the 5400 block of Trinity Street.

78. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 bundle of heroin and 4 Xanax pills to a customer they directed to the 5400 block of Trinity Street.

79. Defendant MICHAEL HARRIS used the telephone to arrange to meet Person #1 in order to obtain additional quantities of heroin for distribution.

80. Defendant MICHAEL HARRIS directed a runner to distribute approximately 7 bundles of heroin stamped "Sponge Bob" to Person # 5, charged elsewhere, after they directed him to the 4900 block of Walton Street.

81. Defendant MICHAEL HARRIS directed a runner to distribute approximately 7 bundles of heroin stamped "Sponge Bob" to Person #3, charged elsewhere, after they directed him to the Apartments.

82. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed one bundle (approximately 0.23 grams) of fentanyl and 4 packets (0.347 grams) of cocaine base "crack" to a law enforcement officer acting in an undercover capacity (UC) after they directed him to the 5400 block of Trinity Street.

On or about March 25, 2016:

83. Defendant MICHAEL HARRIS used the telephone to discuss warning a rival drug trafficker not to sell drugs in Hilltop DTG territory.

84. Defendant MICHAEL HARRIS directed a runner to distribute 10 packets of heroin to a customer they directed to the 5400 block of Trinity Street.

85. Defendants MICHAEL HARRIS and GLEN LONG used the telephone to discuss making arrangements to ensure HARRIS' workers would have connections to his suppliers in order to keep the business running if he was unavailable.

On or about March 26, 2016:

86. Defendant MICHAEL HARRIS directed a runner to distribute 2 bundles of heroin to C.D. after they directed him to the 5800 block of Washington Avenue.

87. Defendants MICHAEL HARRIS and BYSIL DOE distributed 2 sleeves of heroin to M.P. at the Apartments.

88. Defendant MICHAEL HARRIS used the telephone to discuss selling a customer 100 Percocet 30 mg pills for \$2000 on a consistent basis.

On or about March 27, 2016:

89. Defendant MICHAEL HARRIS directed a runner to distribute approximately 5 bundles of heroin to Person #3 after they directed him to the intersection of Washington Avenue & Cecil Street.

90. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$40.00 worth of heroin to a customer they directed to the 5800 block of Washington Avenue.

On or about March 28, 2016:

91. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to arrange for defendant HARRIS to supply the runner with additional drugs to distribute.

92. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed ½ of a bundle of heroin to a customer they directed to the 6100 block of Allman Street.

On or about March 29, 2016:

93. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 and ½ bundles (approximately 0.424 grams) of heroin, stamped “HUSKEE,” to S.M. after they directed him to the 5400 block of Trinity Street.

94. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 12 packets of heroin to a customer they directed to the 5400 block of Trinity Street.

95. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to discuss purchasing a vehicle that defendant DOE could equip with a hidden compartment to conceal drugs or drug proceeds.

96. Defendants MICHAEL HARRIS and GLEN LONG used the telephone to discuss which DTG member was going to take over defendant HARRIS’s phone while he was in prison.

97. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 6 packets of heroin to a customer they directed to the 6100 block of Allman Street.

98. Defendants MICHAEL HARRIS and BYSIL DOE distributed approximately 3 bundles of heroin to Person #3, charged elsewhere.

On or about March 30, 2016:

99. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to discuss the quantity of heroin stamped “HUSKEE” and “MILLS” the DTG had available for distribution.

100. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed one bundle of heroin to a customer they directed to Ruby Street.

101. Defendant MICHAEL HARRIS and Person #1 met in order for defendant HARRIS to purchase additional heroin for re-sale.

On or about March 31, 2016:

102. Defendant MICHAEL HARRIS directed a runner to distribute approximately 2 bundles of heroin stamped “RED RUM” to Person #3.

103. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$40.00 worth of heroin to a customer they directed to the 5900 block of Walnut Street.

104. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to discuss selling Percocet pills and re-supplying defendant ANTOINE ADAMS with additional heroin for re-sale.

On or about April 2, 2016:

105. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 7 packets of heroin to a customer they directed to the 5900 block of Washington Avenue.

106. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 6 packets of heroin to a customer they directed to the 5300 block of Cedar Avenue.

107. Defendants MICHAEL HARRIS and BYSIL DOE used the telephone to discuss collecting money and the pre-paid phones from his runners.

108. Defendants MICHAEL HARRIS and SHYHEIM LINDER discussed defendant HARRIS collecting all of the phones from the runners to send a group message.

109. Defendants MICHAEL HARRIS and DANA STEWART used the telephone to discuss the runner's possession of the telephones belonging to defendant GLEN LONG and another DTG member.

110. Defendants MICHAEL HARRIS and DANA STEWART used the telephone to discuss which suppliers he was obtaining drugs from.

111. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 6 packets of heroin to C.F. after they directed her to the 5400 block of Trinity Street.

112. Defendants MICHAEL HARRIS and CIEAR HAYES used the telephone to discuss turning over Xanax and money to HARRIS.

113. Defendant MICHAEL HARRIS directed a runner to distribute approximately 7 bundles of heroin to Person #3 at the Apartments.

On or about April 3, 2016:

114. Defendant MICHAEL HARRIS distributed 12 bundles of heroin to M.P.

115. Defendant MICHAEL HARRIS directed a runner to distribute 3 packets of heroin to a customer they directed to the 5300 block of Cedar Avenue.

116. Defendant JAMES MASON offered 62 grams of cocaine base (“crack”) to defendant MICHAEL HARRIS and MICHAEL HARRIS agreed to purchase the cocaine base (“crack”).

117. On or about April 4, 2016, defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a bundle of heroin to a customer they directed to the 5800 block of Baltimore Avenue.

On or about April 5, 2016:

118. Defendants MICHAEL HARRIS and ANTOINE ADAMS discussed defendant BYSIL DOE obtaining “HUSKEE” stamped heroin for C.D.

119. Defendants MICHAEL HARRIS and BYSIL DOE discussed how many bundles of heroin defendant DOE had left to sell for defendant HARRIS and defendant DOE buying a car from Person #1.

120. Defendants MICHAEL HARRIS and BYSIL DOE discussed how many Xanax pills defendant HARRIS had left to sell, police presence in the area, and the price of various drugs they wanted to obtain for re-sale.

121. Defendant MICHAEL HARRIS met Person #1 to obtain additional quantities of heroin for distribution.

122. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed approximately 5 bundles (approximately 1.2 grams) of fentanyl without a stamp and heroin stamped “Red Rum” to Person #5.

123. Defendant MICHAEL HARRIS and a DTG member discussed a group they were considering engaging in a shootout with, pooling their money together with defendant ALEXANDER BURNETT and others to place on another DTG member’s prison account, and re-supplying defendant ANTOINE ADAMS with heroin.

124. Defendant MICHAEL HARRIS instructed defendant BYSIL DOE to tell defendant SHYHEIM LINDER that he was on his way to the stash house, to deliver heroin to defendant ANTOINE ADAMS and discussed obtaining heroin from Person #1 and supplying defendant ALEXANDER BURNETT with \$4000.

On or about April 6, 2016:

125. Defendants MICHAEL HARRIS and CIEAR HAYES discussed defendant HARRIS coming to the stash house and supplying defendants HAYES and ANTOINE ADAMS with drugs.

126. Defendants MICHAEL HARRIS and BYSIL DOE discussed how much defendant DOE owed defendant HARRIS from drugs defendant HARRIS had previously supplied defendant DOE.

127. Defendant BYSIL DOE informed defendant MICHAEL HARRIS that he gave the money he owed him to defendant CIEAR HAYES. Defendant HARRIS confirmed the amount and told defendant DOE that he did not yet have drugs to give defendant HAYES to sell but was putting all of his money together to purchase additional heroin from Person #1.



128. Defendant ANTOINE ADAMS called defendant MICHAEL HARRIS to make sure defendant HARRIS knew how to break down bulk quantities of heroin down into smaller packaging for re-distribution.

129. Defendant MICHAEL HARRIS directed a runner to distribute approximately 10 bundles of heroin and fentanyl to Person #3, charged elsewhere.

130. Defendant MICHAEL HARRIS and Person #3, charged elsewhere, distributed heroin and fentanyl to J.A. and death resulted from the use of the heroin and fentanyl.

131. Defendant MICHAEL HARRIS and Person #3, charged elsewhere, distributed heroin and fentanyl to M.M. and serious bodily injury resulted from the use of the heroin and fentanyl.

On or about April 7, 2016:

132. Defendant MICHAEL HARRIS sent a mass text message to his DTG customers advertising that he had drugs for sale and was offering deals for new customers.

133. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed approximately 5 bundles of heroin stamped "BIG RINGS" to Person #3, charged elsewhere.

134. Defendants MICHAEL HARRIS and BYSIL DOE discussed defendant DOE obtaining additional drugs from defendant HARRIS and obtaining drugs from Person #1 and other suppliers.

135. Defendants MICHAEL HARRIS and DANA STEWART used the telephone to discuss the status of the DTG's drug sales and how much money the DTG members were making.

136. Defendants MICHAEL HARRIS and GLEN LONG discussed the fact that one of defendant HARRIS' major suppliers was out of business and the heroin supply was much lighter than normal.

137. Defendant MICHAEL HARRIS met up with defendant ANTOINE ADAMS to supply him with heroin.

138. Defendants MICHAEL HARRIS and DANA STEWART used the telephone to discuss the performance of defendants BYSIL DOE, CIEAR HAYES and ANTHONY QUAIL in making money off of drug sales and the possibility that defendant HARRIS would have to order 300-400 bundles of heroin at a time from Person #1 to continue to do business.

139. On or about April 9, 2016, defendant ANTOINE ADAMS informed defendant MICHAEL HARRIS that defendant BYSIL DOE was supposed to cover a part of his shift but had not answered his telephone. Defendant HARRIS told defendant DOE to call defendant HAYES.

On or about April 10, 2016:

140. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 6 packets of heroin to a customer they directed to the 5900 block of Washington Avenue.

141. Defendant ANTOINE ADAMS and defendant MICHAEL HARRIS discussed defendant ADAMS purchasing a firearm. Defendant HARRIS encouraged defendant ADAMS to ask defendant BYSIL DOE and other runners to purchase the gun with him. Defendant ADAMS declined but told defendant HARRIS that any gun he purchased would belong to the DTG.

On or about April 11, 2016:

142. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$140 worth of heroin to B.S. after they directed to the 5800 block of Washington Avenue.

143. Defendants HYNEEF HARVEY and ANTOINE ADAMS discussed how much heroin to take out to satisfy the day's orders.

144. Defendant MICHAEL HARRIS and a DTG member discussed defendant HARRIS' frustration with Person #1 and whether or not the runner remembered how to operate the hidden compartment in the minivan the DTG used to meet customers and deliver drugs.

On or about April 13, 2016:

145. Defendant MICHAEL HARRIS and Person #1 discussed the quality of the heroin Person #1 had recently supplied defendant HARRIS.

146. Defendant ANTOINE ADAMS answered the DTG's "Chico" telephone and distributed \$120.00 worth of heroin to B.S. after they directed him to the 5800 block of Alter Street.

147. Defendant MICHAEL HARRIS instructed defendant ANTOINE ADAMS that he was going to also supply him with heroin to sell to customers who called defendant DANA STEWART's telephone. He further instructed defendant ADAMS to keep a record of the heroin he sold off of defendant DANA STEWART's telephone.

148. Defendant ANTOINE ADAMS informed defendant MICHAEL HARRIS that defendant DANA STEWART wanted defendant HARRIS to take his phone from defendant JUSTIN PAYNE.

149. On or about April 21, 2016, defendant MICHAEL HARRIS called defendant ANTOINE ADAMS and asked him for profits from drug sales after defendant HARRIS was told by defendant HYNNEEF HARVEY that sales were heavy that morning.

On or about April 22, 2016:

150. Defendants MICHAEL HARRIS, ANTOINE ADAMS, and BYSIL DOE distributed \$40 worth of heroin to S.M. after they directed him to the 5400 block of Trinity Street.

151. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$40 worth of heroin to A.C. after they directed A.C. to the 5800 block of Washington Avenue.

152. On or about April 23, 2016, defendants MICHAEL HARRIS and ANTOINE ADAMS distributed ½ bundle of heroin to a customer they directed to the 6000 block of Washington Avenue.

On or about April 24, 2016:

153. Defendant MICHAEL HARRIS and a member of the DTG discussed defendant HARRIS acquiring 150 30 mg oxycodone pills and 100 15 mg oxycodone pills for re-distribution.

154. Defendants MICHAEL HARRIS and BYSIL DOE discussed defendant HARRIS providing defendant DOE with 100 15mg oxycodone pills for distribution.

155. Defendants MICHAEL HARRIS and ANTOINE ADAMS used the “Chico” telephone to arrange heroin purchases with two customers. After directing both customers to the 6000 block of Washington Avenue, defendant ADAMS supplied each customer. One of the customers, C.D., received approximately 1 bundle and 11 additional packets.

156. Defendants MICHAEL HARRIS and BYSIL DOE discussed defendant DOE delivering drug proceeds to defendant HARRIS that defendant DOE was to receive from defendant ANTOINE ADAMS.

On or about April 25, 2016:

157. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed ½ bundle of heroin to a customer they directed to the 6000 block of Washington Avenue.

158. Defendants HYNEEF HARVEY, MICHAEL HARRIS, and BYSIL DOE discussed defendant DOE’s distribution of Percocets that day and the need for defendants

HARRIS and HARVEY to deliver additional pills for defendant DOE to distribute. Defendant HARRIS informed defendant DOE that he would bring him 100 additional Percocet pills.

On or about April 26, 2016:

159. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed ½ bundle of heroin to E.C. in the 6100 block of Washington Avenue.

160. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 bundle of heroin to S.M. after they directed him to the 6100 block of Washington Avenue.

161. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed ½ bundle of heroin to a customer they directed to the 6000 block of Washington Avenue.

162. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed ½ bundle of heroin to a customer they directed to the 6100 block of Washington Avenue.

On or about April 27, 2016:

163. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 bundle of heroin to a customer they directed to the 5800 block of Washington Avenue.

164. Defendants MICHAEL HARRIS and BYSIL DOE discussed defendant DOE driving defendant ANTOINE ADAMS to deliver drug proceeds to defendant HARRIS.

On or about April 28, 2016:

165. Defendant ANTHONY QUAIL called defendant MICHAEL HARRIS and inquired if defendant HARRIS would sell defendant QUAIL 5 bundles of heroin for \$250.00.

166. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 6 packets of heroin to a customer they directed to the 6000 block of Washington Avenue.

167. Defendants MICHAEL HARRIS and JAMES MASON discussed defendant MASON purchasing a .38 caliber firearm from defendant HARRIS's connection for \$300.

168. Defendant MICHAEL HARRIS instructed defendant ANTOINE ADAMS to supply 5 bundles of heroin to defendant ANTHONY QUAIL.

On or about April 29, 2016:

169. Defendant MICHAEL HARRIS called Person #1 to arrange a meeting to purchase additional quantities of heroin.

170. Defendant MICHAEL HARRIS met Person #1 at the 3400 block of Lancaster Avenue and purchased heroin for re-distribution.

171. Defendant MICHAEL HARRIS asked a regular customer to meet him and test a sample of the heroin he just purchased.

172. Defendant MICHAEL HARRIS called Person #1 and informed him that defendant HARRIS' customer who injects heroin tried Person#1's recent supply and gave it a good report.

On or about May 1, 2016:

173. Defendants MICHAEL HARRIS and CIEAR HAYES discussed the fact that defendant BASIL JOHNSON was on his way to a stash location to package heroin for re-distribution.

174. Defendant MICHAEL HARRIS and Person #1 discussed defendant HARRIS' failed efforts to mix fentanyl with the heroin he purchased from Person #1.

175. Defendant MICHAEL HARRIS asked C.T. to test a sample of heroin. C.T. ordered a bundle and defendant HARRIS gave him 2 additional packets to test. C.T. rated the heroin a 9 out of a possible 10.

176. Defendant MICHAEL HARRIS called defendant ANTOINE ADAMS and inquired if defendant ADAMS had an additional 10 bundles of heroin and informed him that he was dropping off additional "stamps" to brand the heroin.

177. Defendants MICHAEL HARRIS and CIEAR HAYES discussed defendant HAYES providing samples of heroin to testers to ascertain quality.

178. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$40.00 worth of heroin to R.J. in the 5400 block of Trinity Street.

179. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 12 packets of heroin to a customer they directed to the 5400 block of Trinity Street.

180. On or about May 2, 2016, defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$20.00 worth of heroin to E.C. in the 5400 block of Trinity Street.

On or about May 4, 2016:

181. Defendant HYNEEF HARVEY used the “Chico” telephone to send out a blast text message to all of the DTG’s customers advertising a new stamp of heroin named “Diesel.”

182. Defendant MICHAEL HARRIS called defendant ANTOINE ADAMS and asked defendant ADAMS for drug proceeds so that defendant HARRIS could purchase cocaine base “crack” and Xanax.

183. Defendant ANTOINE ADAMS called defendant HYNEEF HARVEY on the “Chico” telephone and instructed him to send customers to Trinity Street.

184. Defendants DANA STEWART and MICHAEL HARRIS discussed the fact that while defendant STEWART was defendant ALEXANDER BURNETT’s brother, defendant HARRIS was defendant BURNETT’s “man.”

185. Defendants MICHAEL HARRIS and ANTOINE ADAMS discussed meeting up so that defendant HARRIS could supply defendant ADAMS with cocaine base “crack” for distribution.

186. Defendants MICHAEL HARRIS and BASIL JOHNSON discussed the manner in which defendant JOHNSON should process and bag up the heroin for distribution.

187. Defendants MICHAEL HARRIS and BASIL JOHNSON discussed processing the heroin in a manner which would provide defendant ANTHONY QUAIL with the maximum amount of heroin to package for distribution.

188. Defendant ANTOINE ADAMS spoke to defendant HYNEEF HARVEY on the “Chico” telephone and asked him to tell defendant MICHAEL HARRIS that he had drug proceeds for him; he needs to be re-supplied and he is going to give defendant BASIL JOHNSON \$300 out of the drug proceeds.

On or about May 5, 2016:

189. Defendant MICHAEL HARRIS texted Person #1 and told him he was going to prison soon so he needed to introduce him to another DTG member.

190. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 ½ bundles of heroin to C.D. after they directed him to the 5800 block of Greenway Avenue.

On or about May 6, 2016:

191. Defendant MICHAEL HARRIS and a DTG member discussed defendant HARRIS needing to be re-supplied after he sold all of the heroin defendant BASIL JOHNSON packaged for him.

192. Defendant MICHAEL HARRIS informed defendant ANTOINE ADAMS that defendant PAUL ROBINSON would have to use the DTG’s minivan to continue the DTG’s drug distribution business.

193. Defendant MICHAEL HARRIS informed Person #1 that he was going to bring Person #1 the money he owed him and was going to introduce him to the individual who would be running the DTG in defendant HARRIS’ absence.

194. Defendant ANTOINE ADAMS informed defendant MICHAEL HARRIS that he was with defendants BYSIL DOE and SHYHEIM LINDER and he needed to be re-supplied.



On or about May 7, 2016:

195. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 17 packets of heroin to a customer they directed to the 6200 block of Ludlow Street.

196. Defendant MICHAEL HARRIS informed defendant SHELIA YOUNG that he was giving the “Chico” telephone to defendant PAUL ROBINSON so that defendant ROBINSON could continue the DTG’s drug distribution business while defendant HARRIS was away.

197. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed a bundle of heroin to a customer they directed him to the 6200 block of Ludlow Street.

On or about May 8, 2016:

198. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed \$40.00 worth of heroin to E.C. after they directed him to the 6300 block of Ludlow Street.

199. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 bundle of heroin to a customer they directed to the 5400 block of Trinity Street.

200. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 12 packets of heroin to J.D. after they directed him to the 4900 block of Sansom Street.

On or about May 9, 2016:

201. Defendants MICHAEL HARRIS and ANTOINE ADAMS discussed the amount of heroin defendant ADAMS and defendant BYSIL DOE had left for distribution.

202. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 13 packets of heroin to A.O. after they directed A.O. to the 5400 block of Trinity Street.

203. Defendants MICHAEL HARRIS, HYNEEF HARVEY and ANTOINE ADAMS distributed approximately 13 packets of heroin to a customer they directed to the 5400 block of Trinity Street.

204. Defendant MICHAEL HARRIS ordered 70 grams of heroin from Person #1.

On or about May 10, 2016:

205. Defendants MICHAEL HARRIS and ANTOINE ADAMS distributed 1 ½ bundles of heroin to a customer they directed to the 4900 block of Sansom Street.

206. Defendants MICHAEL HARRIS and JAMES MASON discussed going to North Philadelphia to find a source of supply for heroin, and defendant HARRIS said he would let defendant MASON know the prices of the heroin when he finds a supplier.

207. Defendant MICHAEL HARRIS and B.N. discussed the fact that Person #1 was in the process of obtaining heroin to supply them.

208. On or about May 12, 2016, defendants MICHAEL HARRIS and ANTOINE ADAMS distributed approximately 23 packets (0.72 grams) of heroin stamped “ALL STATE” to J.D. and M.O.

On or about May 13, 2016:

209. Defendants HANEEF HARVEY and ANTOINE ADAMS discussed whether defendant ADAMS had received heroin from defendant MICHAEL HARRIS for the DTG to distribute.

210. Defendant MICHAEL HARRIS instructed defendant ANTOINE ADAMS to bring him drugs proceeds so that defendant HARRIS would have more money to purchase additional quantities of heroin from their supplier.

211. Defendant HANEEF HARVEY used the telephone to discuss the quality of heroin the DTG was distributing and to provide prices for bundles of heroin.

On or about May 14, 2016:

212. Defendants MICHAEL HARRIS and JUSTIN PAYNE discussed meeting and providing drug proceeds to defendant ANTOINE ADAMS.

213. Defendants MICHAEL HARRIS, DANA STEWART, JUSTIN PAYNE and BYSIL DOE used the telephone to discuss distributing heroin, obtaining additional heroin for distribution, and collecting drug debts. Defendant HARRIS directed defendant DOE to supply defendant JUSTIN PAYNE with heroin for defendant STEWART and to get a bundle of heroin from defendant ANTOINE ADAMS.

214. Defendant DANA STEWART used defendant JUSTIN PAYNE'S telephone and asked defendant MICHAEL HARRIS to connect him with defendant PAUL ROBINSON. Once connected, defendant ROBINSON agreed to get \$100.00 from his runner and deliver it to defendant STEWART.

215. On or about May 15, 2016, defendants HYNEEF HARVEY and BYSIL DOE used the telephone to discuss which of the DTG telephones they needed to pay the bill for. Defendant DOE informed defendant HARVEY that he tried to contact customers on the "white" phone and none of his text messages went through. Defendant HARVEY informed defendant DOE that defendant MICHAEL HARRIS was unavailable and that defendant DANA STEWART said not to use the "black" phone.

216. On or about May 16, 2016, defendants HYNEEF HARVEY and ANTOINE ADAMS distributed 1 bundle (approximately 0.60 grams) of heroin stamped "Allstate" to T.P.

On or about May 17, 2016:

217. Defendants ANTOINE ADAMS and SHYHEIM LINDER possessed with intent to distribute 161 packets (approximately 3.95 grams) of heroin stamped "Allstate" and "Panda."

218. Defendants ANTOINE ADAMS and SHYHEIM LINDER possessed a firearm, that is, a Taurus, .38 special revolver, Serial # OK31426, loaded with 5 live rounds of ammunition.

On or about May 18, 2016:

219. Defendant MICHAEL HARRIS informed an associate that he wanted to see him before defendant HARRIS went to prison and that defendant HYNNEEF HARVEY would be one of the people handling his business while he was away.

220. Defendant BYSIL DOE informed a DTG supplier that he will be handling some business for defendant MICHAEL HARRIS while defendant HARRIS was away.

221. Defendant MICHAEL HARRIS informed a DTG supplier that defendant BYSIL DOE would be helping run defendant HARRIS' business while he was away and defendant HARRIS' "Man" would be handling the telephones belonging to defendants HARRIS and ALEXANDER BURNETT.

222. Defendant MICHAEL HARRIS used the telephone to inform a DTG member that defendant ANTOINE ADAMS had been arrested with drugs, a gun and all of defendant HARRIS' money. Defendant HARRIS and the DTG member agreed that the member would take over for defendant ADAMS and act as a runner for the DTG.

223. Defendant HYNNEEF HARVEY answered the "Chico" telephone and he and defendant MICHAEL HARRIS negotiated the purchase of 50 bundles of heroin for a price of \$85 per bundle. Defendant HARRIS instructed defendant BYSIL DOE to make the purchase and agreed to give defendant DOE half of the money.

224. Defendants MICHAEL HARRIS, HANNEEF HARVEY and BYSIL DOE distributed 3 packets of heroin and 4 Percocet pills to a customer they directed to the 6300 block of Felton Street.

On or about May 19, 2016:

225. Defendant MICHAEL HARRIS called defendant PAUL ROBINSON and asked him to text him his brother's, defendant DAKAR RILEY's telephone number.

226. Defendant MICHAEL HARRIS directed defendant HYNEEF HARVEY to take all of the telephones off silent and start sending the DTG customers to 54<sup>th</sup> & City Avenue to be served by defendants PAUL ROBINSON and DAKAR RILEY.

227. Defendant MICHAEL HARRIS called defendant DAKAR RILEY and informed him that he was about to text him because runners using four different telephone numbers were going to be calling defendant RILEY.

228. Defendant MICHAEL HARRIS informed defendant HYNEEF HARVEY that the DTG was distributing the “Allstate” stamped heroin and directed defendant HARVEY to let DTG customers know that the price of the bundles of heroin was now \$85.00.

229. Defendants HYNEEF HARVEY and DAKAR RILEY distributed 3 packets of heroin to E.C. who they directed to the intersection of Montgomery Avenue and Georges Lane.

On or about June 3, 2016:

230. Defendant PAUL ROBINSON directed a customer ordering Percocets to go to 54<sup>th</sup> and City Avenue.

231. Defendant PAUL ROBINSON informed a customer that he was selling bundles of heroin for \$85.00

On or about June 4, 2016:

232. Defendants MICHAEL HARRIS and PAUL ROBINSON used the telephone to discuss the status of DTG drug sales and how to keep customers coming back. They also discussed the status of defendants BYSIL DOE and CIEAR HAYES’ drug sales.

233. Defendants PAUL ROBINSON and DAKAR RILEY distributed a bundle and 8 packets of heroin to a customer they directed to Ruby Street.

234. On or about June 5, 2016, defendants PAUL ROBINSON and DAKAR RILEY distributed two bundles of heroin to a customer who they directed to the 5400 block of Arlington Street.

235. On or about June 6, 2016, defendants PAUL ROBINSON and DAKAR RILEY distributed 12 packets of cocaine base (“crack”) to customer B.S. in the 5300 block of Montgomery Avenue.

236. On or about June 15, 2016, defendants PAUL ROBINSON and S.J. distributed one half bundle of heroin to a customer they directed to the 5300 block of Morse Street.

237. On or about June 17, 2016, defendants PAUL ROBINSON and DAKAR RILEY distributed 5 bundles (2.6 grams) of heroin stamped “ALL STATE” to a law enforcement officer acting in an undercover capacity (UC) in the 5400 block of Montgomery Avenue.

238. On or about June 20, 2016, defendants PAUL ROBINSON and S.J. distributed 1 bundle (approximately 0.23 grams) of heroin stamped “HOUSE PARTY” to customer J.Do. who they directed to the 5400 block of Morse Street.

239. On or about June 21, 2016, defendants PAUL ROBINSON and DAKAR RILEY distributed \$50 worth of heroin to a customer they directed to the 5300 block of Turner Street.

240. On or about June 23, 2016, defendants PAUL ROBINSON and S.J. distributed one bundle of heroin to a customer they directed to the 5400 block of Morse Street.

241. On or about June 24, 2016, defendants PAUL ROBINSON and S.J. distributed 23 packets (approximately 0.69 grams) of heroin stamped “HOUSE PARTY” to customer J.B. who they directed to the 5200 block of Berks Street.

242. On or about July 12, 2016, defendants PAUL ROBINSON and DAKAR RILEY distributed 4 bundles (approximately 0.82 grams) of heroin stamped “SPACE TIMES” to a law enforcement officer acting in an undercover capacity (UC).

243. On or about January 26, 2017, defendant MICHAEL HARRIS directed a runner to distribute 2 bundles (approximately 0.88 grams) of heroin laced with fentanyl, stamped “Allstate” to a law enforcement officer acting in an undercover capacity (UC).

244. On or about February 2, 2017, defendant MICHAEL HARRIS directed a runner to distribute 2 bundles (approximately 1.18 grams) of heroin laced with fentanyl stamped “Allstate” to a law enforcement officer acting in an undercover capacity (UC).

245. On or about April 12, 2017, defendant BYSIL DOE possessed with intent to distribute 100 alprazolam pills stamped “GG 249.”

On or about June 23, 2017:

246. Defendant BYSIL DOE possessed with intent to distribute 28 packets of heroin laced with Carfentanyl and 291 alprazolam pills stamped “GG 249.”

247. Defendant BYSIL DOE possessed a Glock 19, 9mm caliber, semi-automatic handgun, Serial Number TRZ501 loaded, with 14 rounds of ammunition.

248. On or about October 6, 2017, defendants MICHAEL HARRIS and TYREEK BAILEY distributed 7 bundles (approximately 2.8 grams) of 3-Methylfentanyl to a law enforcement officer acting in an undercover capacity (UC).

249. On or about October 16, 2017, defendant MICHAEL HARRIS directed a runner to distribute 10 bundles (approximately 5.6 grams) of 3-Methylfentanyl to a law enforcement officer acting in an undercover capacity (UC).

250. On or about June 22, 2018, defendant JAMES MASON possessed with intent to distribute one bundle of heroin in the 6500 block of Lansdowne Avenue.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 7, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ALEXANDER BURNETT,  
a/k/a “Pop,”  
a/k/a “Poppy,”  
a/k/a “Ace,”  
a/k/a “Tony,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, to C.F., and death resulted from the use of such substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 23, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a "Chico,"  
a/k/a "Mikey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.60 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 4, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a "Chico,"  
a/k/a "Mikey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.63 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 3, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
SHELIA YOUNG,  
a/k/a “Snoop,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.82 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 11, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.87 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 18, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
BARRY THORNTON**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.71 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 26, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a "Chico,"  
a/k/a "Mikey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.82 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 17, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
KEVIN FISHER**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.004 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 11, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MAKAL HARRIS,  
a/k/a "Stu,"**

knowingly and intentionally possessed with intent to distribute approximately 5.66 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).



**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 16, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.83 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 16, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.33 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and approximately 0.16 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 26, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
KEVIN FISHER**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.73 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of 6 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 6 packets a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT EIGHTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 13 bags of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT NINETEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 13 bags of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a/ “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one and ½ bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one and ½ bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT TWENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT TWENTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT THIRTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT THIRTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT THIRTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT THIRTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT THIRTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT THIRTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FORTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution, of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT FORTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, within 1,000 feet of the real property comprising The John P. Turner Middle School, a public elementary school, located at 5900 Baltimore Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FORTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 19, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.



**COUNT FORTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 19, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FORTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 19, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT FORTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 19, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FORTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 20, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FORTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 20, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FORTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 22, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 17 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT FORTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 22, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 17 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FIFTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one and ½ bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT FIFTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one packet of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and four pills of a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), (b)(2), and Title 18, United States Code, Section 2.

**COUNT FIFTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIFTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 23, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT FIFTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, four packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIFTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, four packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FIFTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 3 pills of a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), (b)(2), and Title 18, United States Code, Section 2.

**COUNT FIFTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 3 pills of a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), (b)(2).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FIFTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 4 pills of a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), (b)(2), and Title 18, United States Code, Section 2.



**COUNT FIFTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 4 pills of a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), (b)(2).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SIXTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 7 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SIXTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a "Chico,"  
a/k/a "Mikey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 7 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SIXTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SIXTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.23 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (fentanyl), and approximately 0.347 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), both Schedule II controlled substances.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SIXTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.23 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), and approximately 0.347 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), both Schedule II controlled substances, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SIXTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 25, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, ten packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SIXTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 25, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, ten packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.



**COUNT SIXTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, two bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18 United States Code, Section 2.

**COUNT SIXTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 20 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SIXTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 20 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SEVENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 27, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, five bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 27, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 28, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 29, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.424 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 29, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.424 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.



**COUNT SEVENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 29, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 29, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 29, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 29, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, three bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT SEVENTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 30, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 31, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, two bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 31, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT EIGHTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 2, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, seven bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 3, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 3, 2016, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Beverly Hills Middle School, a public elementary school, located at 1400 Garrett Road, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT EIGHTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 3, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, three packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINETY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 4, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT NINETY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 4, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The John P. Turner Middle School, a public elementary school, located at 5900 Baltimore Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT NINETY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 5, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.2 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] (fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINETY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 6, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, ten bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINETY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 6, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, to J.A., and death resulted from the use of such substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINETY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 6, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, to M.M., and serious bodily injury resulted from the use of such substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINETY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 7, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, five bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT NINETY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 10, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE NINETY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 11, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT NINETY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 13, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”  
ANTOINE ADAMS,  
a/k/a “Twin,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”  
ANTOINE ADAMS,  
a/k/a “Twin,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 22, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 23, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 23, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Add B Anderson School, a public elementary school, located at 1034 S. 61<sup>st</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 25, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT ONE HUNDRED-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 25, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Add B Anderson School, a public elementary school, located at 1034 S. 61<sup>st</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 26, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half of a bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 26, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 26, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 26, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 27, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 28, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 28, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, six packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Add B Anderson School, a public elementary school, located at 1034 S. 61<sup>st</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.



**COUNT ONE HUNDRED-FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 1, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and  
substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 1, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 1, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a  
mixture and substance containing a detectable amount of heroin, a Schedule I controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-EIGHTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 1, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED NINETEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 2, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and  
substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 2, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 5, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one and ½  
bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 7, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 17 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT ONE HUNDRED TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 7, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of  
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 8, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and  
substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 8, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of  
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 8, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of  
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled  
substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian  
Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia,  
Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United  
States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 9, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 13 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 9, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 13 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED TWENTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 9, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”  
ANTOINE ADAMS,  
a/k/a “Twin,” and  
HYNEEF HARVEY,  
a/k/a “Neef,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 13 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 9, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”  
ANTOINE ADAMS,  
a/k/a “Twin,” and  
HYNEEF HARVEY,  
a/k/a “Neef,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 13 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.



**COUNT ONE HUNDRED THIRTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 10, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one and ½ bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 10, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, one and ½ bundles of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The West Philadelphia High School, a public high school, located at 4901 Chestnut Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED-THIRTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 12, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.72 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 12, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.72 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Evelyn Graves Christian Academy, a private elementary school, located at 5447 Chester Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 16, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**HANEEF HARVEY,  
a/k/a "Neef," and  
ANTOINE ADAMS,  
a/k/a "Twin,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.60 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**SHYHEIM LINDER,  
a/k/a “Shy,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 3.95 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 18, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Mikey,”  
HYNEEF HARVEY,  
a/k/a “Neef,” and  
BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 3 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 4 pills of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED THIRTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 4, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle  
and 8 packets of a mixture and substance containing a detectable amount of heroin, a Schedule I  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and Title  
18, United States Code, Section 2.



**COUNT ONE HUNDRED THIRTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 5, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, two bundles of  
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and  
Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 6, 2016, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, 12 bags of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 15, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, one half bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Mastery Charter School Mann Elementary, a public elementary school, located at 5376 W. Berks Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 17, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.6 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 20, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.23 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 20, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.23 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Mastery Charter School Mann Elementary, a public elementary school, located at 5376 W. Berks Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 21, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT ONE HUNDRED FORTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, a bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Mastery Charter School Mann Elementary, a public elementary school, located at 5376 W. Berks Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FORTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 24, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**PAUL ROBINSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.69 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FIFTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 12, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.82 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FIFTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 12, 2016, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PAUL ROBINSON, and  
DAKAR RILEY,**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.82 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Mastery Charter School Mann Elementary, a public elementary school, located at 5376 W. Berks Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FIFTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 26, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a "Chico,"  
a/k/a "Mikey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 0.88 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FIFTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 2, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.18 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FIFTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 12, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of alprazolam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(2).



**COUNT ONE HUNDRED FIFTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BYSIL DOE,  
a/k/a “Baz,”**

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and alprazolam, a Schedule IV controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(2).

**COUNT ONE HUNDRED FIFTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BYSIL DOE,  
a/k/a “Baz,”**

knowingly possessed a firearm, that is a Glock 19, .9mm caliber, semi-automatic handgun, serial number TRZ501, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute controlled substances in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT ONE HUNDRED FIFTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BYSIL DOE,  
a/k/a “Baz,”**

having been convicted in a Court in the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Glock 19, .9mm caliber, semi-automatic handgun, serial number TRZ501, loaded with 14 rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT ONE HUNDRED FIFTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 6, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
TYREEK BAILEY,  
a/k/a “Reek,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.8 grams of a mixture and substance containing a detectable amount of 3-methylfentanyl, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED FIFTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 16, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MICHAEL HARRIS,  
a/k/a "Chico,"  
a/k/a "Mikey,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 5.6 grams of a mixture and substance containing a detectable amount of 3-methylfentanyl, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT ONE HUNDRED SIXTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 22, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMES MASON,  
a/k/a "Hov,"**

knowingly and intentionally possessed with intent to distribute one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT ONE HUNDRED SIXTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 22, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAMES MASON,  
a/k/a "Hov,"**

knowingly and intentionally possessed with intent to distribute one bundle of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising The Lewis C. Cassidy Academics Plus Elementary School, a public elementary school, located at 6523 Landsdowne Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT ONE HUNDRED SIXTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From at least in or around 2013, to in or around July, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

managed and controlled, whether permanently or temporarily, either as owner, lessee, agent, employee, occupant, or mortgagee, and knowingly and intentionally made available for use, with or without compensation, 5412 Trinity Street, in Philadelphia, for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, that is, heroin, a Schedule I controlled substance, and aided and abetted the same.

In violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.



**COUNT ONE HUNDRED SIXTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From at least in or around 2013, to in or around July 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MICHAEL HARRIS,  
a/k/a “Chico,”  
a/k/a “Mikey,” and  
ANTOINE ADAMS,  
a/k/a “Twin,”**

managed and controlled, whether permanently or temporarily, either as owner, lessee, agent, employee, occupant, or mortgagee, and knowingly and intentionally made available for use, with or without compensation, 5812 Washington Avenue, in Philadelphia, for the purpose of unlawfully manufacturing, storing, distributing, and using a controlled substance, that is, heroin, a Schedule I controlled substance, and aided and abetted the same.

In violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE NO. 1**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1), 860(a), 856 and 843(b), set forth in this indictment, defendants

**MICHAEL HARRIS,**

**a/k/a "Chico,"**

**a/k/a "Mikey,"**

**ALEXANDER BURNETT,**

**a/k/a "Poppy,"**

**a/k/a "Pop,"**

**a/k/a "Ace,"**

**a/k/a "Tony,"**

**HANEEF HARVEY,**

**a/k/a "Neef,"**

**DANA STEWART,**

**a/k/a "Bedrock,"**

**a/k/a "B.R.,"**

**PAUL ROBINSON,**

**MAKAL HARRIS,**

**a/k/a "Stu,"**

**BASIL JOHNSON,**

**a/k/a "Mac,"**

**ANTHONY QUAIL,**

**a/k/a "Taz,"**

**GLEN LONG,**

**a/k/a "Big Dog"**

**ANTOINE ADAMS,**

**a/k/a "Twin,"**

**BYSIL DOE,**

**a/k/a "Baz,"**

**SHYLEIM LINDER,**

**a/k/a "Shy,"**

**CIEAR HAYES,**

**a/k/a "Gutter,"**

**JAMES MASON,**

**a/k/a "Hov,"**

**BARRY THORNTON,**

**KEVIN FISHER,**

**SHEILA YOUNG,**

**DAKAR RILEY,**

**TYREEK BAILEY,**

**a/k/a "Reek," and**

**JUSTIN PAYNE,**

**a/k/a “Ski,”  
a/k/a “Lil Ski,”**

shall forfeit to the United States of America:

a. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

b. Any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including the following:

1. \$2,000,000 U.S. currency.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE NO. 2**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 924(c), and 922(g)(1), set forth in this indictment, defendant

**BYSIL DOE,  
a/k/a "Baz,"**

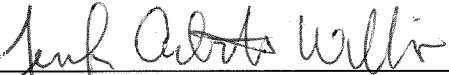
shall forfeit to the United States of America, the firearms and ammunition involved in the commission of such offenses, specifically,

- (1) a Glock 19, .9mm caliber, semi-automatic handgun, Serial Number TRZ501; and
- (2) a magazine of 14 rounds of .9mm ammunition;

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

  
\_\_\_\_\_  
**JENNIFER ARBITTIER WILLIAMS**  
**ATTORNEY FOR THE UNITED STATES**  
**Acting Under Authority Conferred By 28 U.S.C. § 515**